



U.S. Department of Justice

United States District Court
Southern District of New York

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The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 3, 2020

BY ECF

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *United States v. Eva Christine Rodriguez and Sergio Lorenzo Rodriguez*
20 Cr. 513 (AT)

Dear Judge Torres:

The Government respectfully submits this letter, with the defense's consent, to request a two-week extension of the deadline to complete Rule 16 discovery, to December 18, 2020. The current deadline is set for December 4, 2020. This request is made because special software is required to download extracted data from approximately three computers belonging to one of the defendants, and the United States Postal Inspection Service's computer lab will not have access to that software until next week. The Government has been producing discovery on a rolling basis and, with the exception of the data requiring special software, will produce all other Rule 16 discovery by December 4th. If this request is granted, the Government would consent to a corresponding two-week adjournment of the next status conference, to February 15, 2020, so that the defense would have sufficient time to review discovery and decide what motions, if any, to make.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney
Southern District of New York

By: /s/ Sarah Lai
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Assistant United States Attorney
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GRANTED. By **December 18, 2020**, the Government shall produce all discovery. The status conference scheduled for February 1, 2021, is ADJOURNED to **February 15, 2021**, at **2:00 p.m.** Time until February 15, 2021, is excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), because the ends of justice served by excluding such time outweigh the interests of the public and Defendant in a speedy trial in that this will permit counsel additional time to review discovery and determine if there are pretrial motions to file.

SO ORDERED.

Dated: December 3, 2020
New York, New York

ANALISA TORRES
United States District Judge